



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

October 29, 1997

Reply To
Attn Of: HW-113

RECEIVED IN

NOV 06 1997

Nolan R. Jensen, Acting Manager
Environmental Restoration Program
Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Program Management

Re: Comments on: Draft Final Record of Decision (ROD) Resulting
From Waste Area Group (WAG) 2 Comprehensive Remedial
Investigation/Feasibility Study, Operable Unit (OU) 2-13, at
the Idaho National Engineering and Environmental Laboratory
(INEEL)

Dear Mr. Jensen:

Enclosed are the EPA comments on the subject Draft Final
Record of Decision (ROD). Comments 1-6 represent substantive
issues, while the remaining comments are largely editorial. If
you have any questions, please contact me at 206-553-8633.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Poeton".

Richard Poeton, WAG 2 Manager

encl

cc: D. Nygard, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
J. Underwood, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
W. Pierre, ECL-113, w/encl

EPA Comments on:

Draft Final Record of Decision (ROD) for the Waste Area Group (WAG) 2 Comprehensive Remedial Investigation/Feasibility Study, Operable Unit (OU) 2-13, at the Idaho National Engineering and Environmental Laboratory (INEEL).

Comments:

1. p. viii

The first paragraph under Statutory Determination is missing standard language regarding treatment, permanent solutions, etc. that was in previous draft.

2. p. 5-6

The top paragraph regarding the no longer contained in determination needs to address actions if no longer contained in determination is not made. See also Sections 5.2.2, 7.3.1.2 and 8.1.1.

The second paragraph under Statutory Determination is not appropriate to that section. Consider moving to another section.

3. p. 7-1

In the paragraph at bottom of the page, second sentence: Delete discussion of 9355.0-30, since this directive pertains to the need for action rather than PRGs. The basis for using the upper end of the acceptable risk range for PRGs can be justified based on remoteness of the site, conservatism of risk estimates, lack of current residents, and modeling 100 years in the future for future residents. For radionuclides, the use of the upper end of the risk range could also be justified as consistent with levels considered protective in other EPA regulations and guidance, including those establishing acceptable levels of radiation exposure to the public from sources of radiation.

4. p.7-5

The paragraph beginning "A description of the areas..." should include a provision that DOE send the information required by that paragraph to EPA and the State.

5. Section 9.4

This section is missing a necessary statutory determination, i.e.: utilization of permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable.

6. Section 10

This section needs to add logical outgrowth language to explain why a new proposed plan and comment period were not added.

7. Description of Selected Remedies (p. iv)

Descriptions in this section need to be consistent with those in Section 8.1, and also with the Description of Alternatives in Section 7. The description for the Chemical Waste Pond (p. v), for instance, does not include the excavation provisions noted in Section 8.1.2.

The section Description of Selected Remedies refers to "principal threats" in a number of locations. In a CERCLA context, "principal threat" has a specific meaning, generally applied to highly toxic or mobile wastes, that anticipates treatment. In this context, the intended meaning is more "primary risk". I recommend changing "principal threat" to "risk" in this section.

8. p. ix

The last paragraph should be relocated to Selected Remedy section, and also added to Chapter 8.

9. Section 5.2.1.1

In the second paragraph, third line: something is missing from the text.

10. p.7-5

The paragraph beginning "A description of the areas..." should include a provision that DOE send the information required by that paragraph to EPA and the State.

11. Section 8.1.1

This section should reference the institutional control provisions described in Alternative 2.

12. Table 8-1

The Table description of the Chemical Waste Pond remedy is not consistent with the description in Section 8.1.2.

13. Table 9-2

The costs for selected remedies are not shaded in the table.